

# **VANDERSLICE DECL. EXHIBIT A11**

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21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA

23 KLEIN, et al.

24 Plaintiff,

25 v.

26 META PLATFORMS, INC., et al.

27 Defendants.  
28

Case No. 3:20-CV-08570-JD

**DECLARATION OF WARREN SOLOW**

I, Warren Solow, declare:

1. I am the Information Governance and Ediscovery Lead at ByteDance Inc., an affiliate of non-party TikTok Inc. (“TikTok”).

2. Through the course of my employment, I have become familiar with TikTok’s treatment of confidential and proprietary business information. I make this declaration in support of the Consumer Plaintiffs’ omnibus motion to seal materials submitted in connection with the Class Certification and *Daubert* Briefing (“Omnibus Sealing Motion”) pursuant to Civil Local Rule 79-5(e). I know the facts stated herein based on my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

3. I understand that the parties to the litigation have filed the Declaration of Dr. Nicholas Economides in Support of Consumer Plaintiffs’ Motion for Class Certification Errata, dated July 27, 2023, ECF No. 645-5 (the “Economides Declaration”).<sup>1</sup> The Economides Declaration contains TikTok’s non-public and confidential information. As specified herein, certain portions of the Economides Declaration should remain under seal.

| Document               | Portion(s) to Maintain Under Seal   | Basis for Sealing Request  |
|------------------------|---|--|
| Economides Declaration | Portion of Page 45, Par. 141 (quoted text in the last sentence)                                       | This text contains confidential and non-public information from a TikTok research report analyzing user behavior. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing. |
| Economides Declaration | Portion of Page 45, Footnote 156, descriptions for the following Bates stamps: TIK-00000001–024; TIK- | This text contains confidential and non-public information relating to government investigations   |

<sup>1</sup> I understand that Meta’s counsel has stated that the Economides Declaration was also attached as an exhibit under the following docket entries: ECF Nos. 651-4; 663-2; and 669-7.

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|------------------------|--|--|
|                        | 00000103–142; TIK-00000143–153; TIK-00000083–102; TIK-00000401–455; TIK-00000025–055 | and potential business strategies. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing.  |
| Economides Declaration | Portion of Page 45, Footnote 156; quoted text from TIK-00000143–153 at 144           | This text contains confidential and non-public information relating to potential business strategies. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing. |
| Economides Declaration | Portion of Page 45, Footnote 156; quoted text from TIK-00000083–102 at 092           | This text contains confidential and non-public information relating to potential business strategies. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing. |
| Economides Declaration | Portion of Page 45, Footnote 156; quoted text from TIK-00000001–024 at 009           | This text contains confidential and non-public information relating to potential business strategies. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing. |

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|------------------------|--|---|
| Economides Declaration | Portion of Page 46, Footnote 158 (last sentence in the quoted parenthetical)                                     | This text contains confidential and non-public information relating to TikTok's potential business strategies. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing. |
| Economides Declaration | Portion of Page 46, Par. 144 (quoted text in the second sentence followed by "TikTok's parent ByteDance stated") | This text contains confidential and non-public information about TikTok's potential business strategies. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing.       |
| Economides Declaration | Portion of Page 46, Footnote 159, description for TIK-00000001-24 at 8-10, 21                                    | This text contains non-public information relating to government investigations. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing.                               |
| Economides Declaration | Portion of Page 52, Footnote 208, description for TIK-00000001 at TIK-00000011                                   | This text contains non-public information relating to government investigations. Legitimate privacy interests warrant the sealing of this confidential information, the disclosure of which would cause injury to TikTok that could not be avoided through any less restrictive alternative to sealing.                               |

1           5.       These proposed redactions are limited in scope; they do not reflect all information  
2 that TikTok provided in the above-referenced litigation that were provided pursuant to the  
3 Court's Stipulated Protective Order, ECF No. 314, and that are included in the Economides  
4 Declaration.

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1 I declare, under penalty of perjury, that the foregoing is true and correct to the best of my  
2 knowledge, information, and belief.

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4 Date: November 15, 2023



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Warren Solow

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